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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

ELAINE KERN,

Plaintiff,

v.

DZAVAD KRSO and
BLUESTAR SERVICES LLC,

Defendants.

No. 20 L 2129

8583351

**EMERGENCY MOTION TO APPOINT SPECIAL PROCESS SERVER AND
CONDUCT LIMITED PRELIMINARY DISCOVERY**

Petitioner, ELAINE KERN, through her attorneys, CAVANAGH LAW GROUP, moves this Honorable Court for leave to appoint UNITED PROCESSING, INC. (License No. 117-001101), a detective agency, as Special Process Server, said person being duly qualified under the laws of this State to act in such capacity, for the purpose of serving Summons on Defendant, BLUESTAR SERVICES LLC, and Conduct Limited Preliminary Discovery and in support thereof states as follows:

1. The instant lawsuit was filed on February 20, 2020 and arises out of a motor vehicle collision which occurred on April 30, 2018 where the Plaintiff was seriously injured when a semi-truck believed to owned by Defendant, BLUESTAR SERVICES LLC, and operated by Defendant, DZAVAD KRSO, rear-ended the vehicle Plaintiff was driving.

2. It is expected that the applicable statute of limitations for this claim expires on April 30, 2020.

3. Plaintiff now seeks leave to issue written discovery (limited Interrogatories and Rule 214 Requests to Produce) to confirm the identity of responsible parties, such as the owner



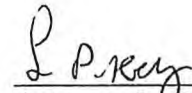
of the truck, the company who was employing the defendant driver, whether any bills of lading exist for the truck on the date of the incident, what goods the truck was hauling and what company hired the truck to haul the aforementioned goods; all before the expiration of the 2-year statute of limitations.

5. This information is pertinent to Plaintiff's case and Plaintiff would be severely prejudiced if she did not receive this information that Plaintiff believes is in the control and possession of Defendants.

6. Thus, Plaintiff seeks leave to issue this limited preliminary discovery *instanter*, and respectfully requests the court set an expedited schedule for Defendants to answer the limited discovery.

WHEREFORE, Petitioner respectfully requests that UNITED PROCESSING, INC. (License No. 117-001101), a detective agency, be appointed as Special Process Server, said person being duly qualified under the laws of this state to act in such capacity and that Plaintiff be granted leave to conduct limited preliminary discovery.

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